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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 JULIUS CZUDAR,

12 Plaintiff,

13 vs.

14 PRO-VIGIL, INC., a foreign Corporation
15 headquartered in Texas,

16 Defendant.

Case No.: 2:19-cv-01784-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
RESPOND TO PLAINTIFF'S
COMPLAINT**

(Third Request)

17 IT IS HEREBY STIPULATED by and between Plaintiff Julius Czudar ("Plaintiff"),
18 through his counsel Mullins & Trenchak, Attorneys at Law, and Defendant Pro-Vigil, Inc.,
19 ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant's time to respond to
20 Plaintiff's Complaint shall be extended an additional twenty-one (21) days after Plaintiff files an
21 Amended Complaint. This Stipulation is submitted and based upon the following:

- 22 1. That Defendant's answer or response is currently due on December 17, 2019.
- 23 2. That this is the third request for an extension of time for Defendant to respond to
24 Plaintiff's Complaint.
- 25 3. That Defendant was prepared to file a motion to dismiss to address various
26 deficiencies in Plaintiff's Complaint;
- 27 4. That Plaintiff anticipates filing an Amended Complaint to address these deficiencies
28 by January 15, 2020;

5. That Defendant shall have twenty-one (21) days after Plaintiff files his Amended Complaint to file a response.

6. That nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 17th day of December, 2019.

MULLINS & TRENCHAK, ATTORNEYS AT LAW JACKSON LEWIS P.C.

/s/ Philip J. Trenchak
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Pro-Vigil, Inc

ORDER

IT IS SO ORDERED:

~~United States District Court Judge~~
United States Magistrate Judge

Dated: December 18, 2019